I do NOT believe this rule making should be supported. Allowing an individual to be "upgraded" after 20 years of operating does NOT qualify them for a higher grade license. As a holder of an extra class license (WL7M) and being license for over 40 years, I do not believe that I should be granted a first class commercial license, for example, by simply having been licensed for a period of time. Please do not support this proposed rule making.

Joe Hannigan Colonel, USAF (Ret) WL7M